

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT
OF EXPENSES INCURRED AND FOR PAYMENT OF INCENTIVE AWARD**

Plaintiff hereby seeks entry of an Order providing:

(1) an award of \$333,333.33 (or 1/3 of the Settlement Fund) in attorneys' fees to

Plaintiff's Counsel;

- (2) the reimbursement of \$102,910.26 in expenses advanced by Plaintiff's Counsel; and
- (3) payment of an incentive award of \$10,000.00 to Plaintiff Thomas Boland.

Support for this Motion is contained in the accompanying Memorandum in

Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses Incurred and for Payment of Incentive Award.

Date: September 24, 2013

Respectfully Submitted,

s/ John G. Felder

John G. Felder, Jr. (State ID No. 7051)
McGOWAN, HOOD & FELDER, LLC
1405 Calhoun St.
Columbia, SC 29201
(803) 779-0100 Fax: (803) 256-0702
jfelder@mcgowanhood.com

Brian D. Penny
GOLDMAN SCARLATO KARON & PENNY, P.C.
101 E. Lancaster Avenue, Suite 204
Wayne, PA 19087
(484) 342-0700
penny@gskplaw.com

Attorneys for Plaintiff and the Class